



**Intercontinental Terminals Company (ITC) Fire Morning Update
Deer Park, Texas
April 3, 2019 0000 – April 3, 2019 1159**

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities

conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

Executive Overview:

- The rain event during the evening of April 3, 2019, removed the foam which had been sprayed on the tanks. This resulted in an increase in benzene detections and readings around the tank farm and Tidal Road (all within the hot zone) starting around 8 pm and through the night on April 3, 2019 – readings ranged from .5 ppm to 6.2 ppm along Tidal Road. The facility began foaming again around 9 pm. Heavy rain moved in around 12:30 am and lightning shortly after 1 am. Field teams stood down per lightning protocols. Once the The facility started foaming again after the rain moved through Dow Chemical did a self-called shelter-in-place from 11 pm to 2:30 am.
- The flushing of Tucker Bayou began at 1500 hours and ended at 1900 hours. The benzene reading did not spike during the flushing activities.
- EPA, NOAA, TCEQ, TPWD and ITC representatives met over the SCAT endpoint plan. Discussions focused on differentiation between the SCAT visible oil plan and further actions which may occur under remediation.
- Late on April 1, ITC requested to utilize outfall 005 to drain the noncontact stormwater from the base oil tank farm that lies right along Tucker Bayou. EPA and TCEQ discussed with TCEQ management, who agreed to plan, as long as ITC samples the water (using their normal noncontact protocol) and the discharge will not affect operations on Tucker Bayou (ITC will work with EPA and USCG early on April 2 on approval of this issue). TCEQ and EPA received the sampling results early on April 2; both COD and pH are within their permitted limits.
- If it rains a substantial amount, the facility will need to utilize their outfalls as a normal procedure to release stormwater. Outfalls 002 and 003 would not be utilized due to the waters that would be coming to those areas would be contact water due to the incident. The drainage ditch immediately off Independence and Tidal road is a natural flow area for all upstream businesses and drainage areas. These waters cannot be controlled and will pass through affected areas of the incident and ultimately will end up in Tucker Bayou. The dams that have been put in place will remain to try to control the water but may be washed away if a large amount of rain occurs.
- Several entities including Texas Commission on Environmental Quality (TCEQ), EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- ITC continued community air monitoring on April 3 (midnight to midnight); there were 742 VOC readings (22 detections) and 544 benzene readings (10 detections).
- EPA conducted surface water sampling on April 3, 2019, at 10 sample locations. The surface water samples were collected along Buffalo Bayou and the San Jacinto River, and will be analyzed for PFAS, VOCs, SVOCs, COD, and Oil & Grease.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft found no exceedances of the Texas comparison values on April 3, 2019 during Flight 18. ASPECT has conducted a screening level assessment to evaluate the unreported or undetected releases of hazardous materials or contaminants at the Intercontinental Terminal Company (ITC) in Deer Park, Texas. The screening level results from ASPECT were compared to the ASPECT list of Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs)

and found no exceedances of the short-term AMCVs. No chemicals were detected by the ASPECT.

- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on April 3, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs. These results have been shared with unified command and local officials.
- EPA conducted handheld air monitoring on April 3, 2019, from 00:00 to 23:59 at 64 locations. Results were reported above the detection limit at two locations for total volatile organic compounds (VOCs) and one location for benzene. Benzene was not detected above the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Value (AMCV) (0.18 ppm). EPA will conduct additional air monitoring and deploy the Trace Atmospheric Gas Analyzer (TAGA) to determine if VOCs continue to be detected.
- TCEQ continued handheld air monitoring on April 3 from 12:00 am to 10:00; no readings above the Unified Command action level were detected.
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue on 24 hour basis.
- As of 7:00 pm on Wednesday, April 3:
 - 125,400 feet of boom deployed
 - 80,920 bbl of product/water recovered from water operations
 - 102,729 bbl of product/water recovered from tank farm
 - Approximately 465,000 gallons of foam concentrate used for fire-fighting/suppression and emission suppression
 - 1,945 Federal, State, Local and ITC representatives are working on site working the response (field, command post)

| Total Vessels as of April 3, 2019 | | | | |
|-----------------------------------|--------|---------------------------------|----------|---------------|
| Work Boats | Barges | Small Capacity Skimming Vessels | Skimmers | Total Vessels |
| 118 | 113 | 25 | 102 | 338 |

| Tank Status | Tank No. |
|-------------|---|
| Complete | 80-2, 80-3, 80-7, 80-10, 80-12, 80-13, 80-14, 80-15 |
| Standby | 80-1, 80-4, 80-5, 80-6, 80-8, 80-9, 80-11 |

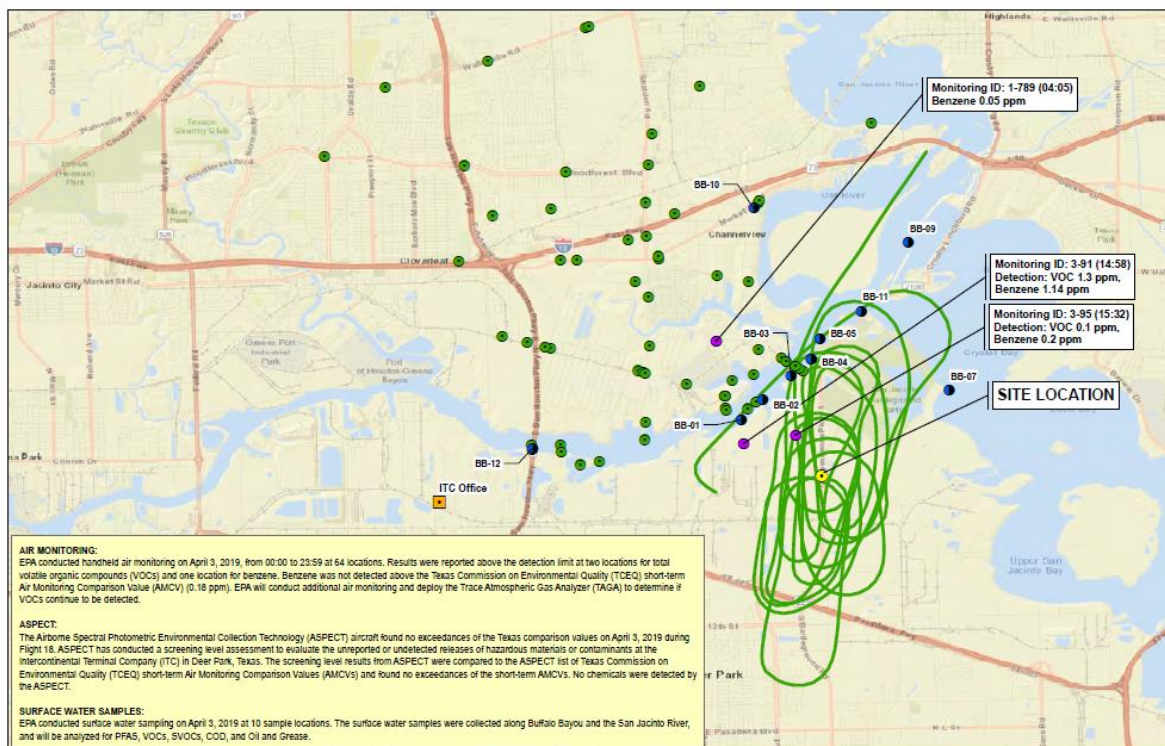
Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

| Personnel | EPA R6 Dallas | ITC Deer Park | Total |
|-------------------|---------------|---------------|-----------|
| EPA Region 6 | 11 | 10 | 21 |
| EPA Non-Region 6 | 0 | 6 | 6 |
| START | 1 | 18 | 19 |
| Other Contractors | 0 | 8 | 8 |
| Total | 12 | 42 | 54 |

Additional Information: Air Monitoring and Water Sampling locations, and Waste Storage Tanks:



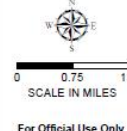
Legend

- ASPECT DATA (No Readings Above Benchmarks)
- ITC OFFICE LOCATION
- SITE LOCATION
- WATER SAMPLE LOCATION
- AIR MONITORING LOCATION
- NON DETECTION
- DETECTION

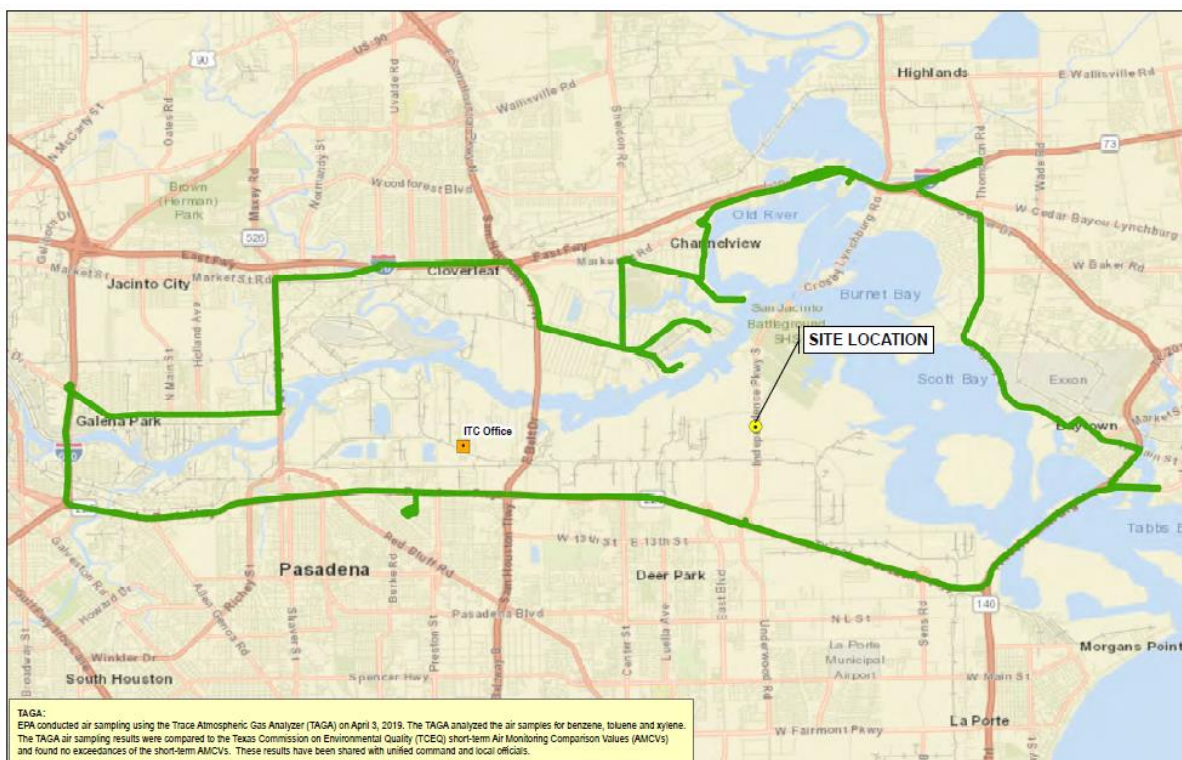


AIR MONITORING MAP INTERCONTINENTAL TERMINALS COMPANY FIRE 1943 INDEPENDENCE PARKWAY LA PORTE, HARRIS COUNTY, TEXAS

REPORTING PERIOD #28
4/3/2019 00:00 - 4/3/2019 23:59



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| Substance | CAS # | Short-term AMCV Health (ppb) |
|------------|-------------|------------------------------|
| benzene | 71-43-2 | 180 |
| m/p-xylene | 179601-23-1 | 1700 |
| o-xylene | 95-47-6 | 1700 |
| toluene | 108-88-3 | 4000 |

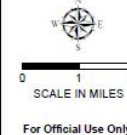
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- ITC OFFICE LOCATION
- SITE LOCATION
- RESULTS BELOW AMCVs



TAGA MONITORING MAP INTERCONTINENTAL TERMINALS COMPANY FIRE 1943 INDEPENDENCE PARKWAY LA PORTE, HARRIS COUNTY, TEXAS

REPORTING PERIOD #28
4/3/2019 00:00 - 4/3/2019 23:59



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